

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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GREAT WESTERN INSURANCE COMPANY

: Case No. 18-cv-06249 (VSB)

Plaintiff,

vs.

MARK GRAHAM, DONALD SOLOW, BLUE  
CAPITAL MANAGEMENT, INC., BLUE  
ALTERNATIVE ASSET MANAGEMENT LLC,  
WILMINGTON SAVINGS FUND SOCIETY, FSB,  
CHRISTIANA TRUST, REGATTA HOLDINGS  
LLC, CYGNET 001 MASTER TRUST, CYGNET  
001 MASTER TRUST SERIES 2011-A, CYGNET  
001 MASTER TRUST SERIES 2011-C, CYGNET  
001 MASTER TRUST SERIES 2013-A, ALPH RE  
LIMITED, ALPHA RE HOLDINGS (CAYMAN)  
LIMITED, ATLANTIC SPECIALTY FINANCE,  
BLUE ELITE FUND LTD., BLUE ELITE FUND  
LP, BLUE II LTD., SANCUS CAPITAL BLUE  
CREDIT OPPORTUNITIES FUND LTD.,  
ABILITY INSURANCE COMPANY, JOHN  
DRAKE, EDWARD BRENDA LYNCH, AND  
GREGORY TOLARAM.

Defendants.

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Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure and to enable District Judges and Magistrate Judges of the Court to evaluate possible disqualification or recusal, the undersigned counsel for defendant Sancus Capital Blue Credit Opportunities Fund, Ltd. (“Sancus Blue”), a private non-governmental party, certifies that there is no parent corporation of Sancus Blue and no publicly held corporation owning 10% or more of its stock.

Dated: New York, New York  
August 20, 2018

SEWARD & KISSEL LLP

By: /s Jack Yoskowitz  
Jack Yoskowitz  
Laura Miller  
One Battery Park Plaza  
New York, New York 10004  
Tel. (212) 574-1200  
Fax: (212) 480-8421  
[yoskowitz@sewkis.com](mailto:yoskowitz@sewkis.com)  
[millerl@sewkis.com](mailto:millerl@sewkis.com)

*Attorneys for Defendant Sancus  
Capital Blue Credit Opportunities  
Fund, Ltd.*